Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the Record 1 of 1
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Comments Concerning RM-9148
1998 Biennial Review
Amendment of Part 97 of the Commission's Amateur Service Rules

My name is Jeff Steinkamp, KD5YG, and I have been involved with the Amateur Service since 1967 and became licensed in 1981. I hold an Advanced Class license and have held licenses from Iceland (KD5YG/TF), Korea (HL9YG) and Japan (7J1AUO). I have also traveled around the world in the past 10 years and have had the opportunity to review the amateur licensing requirements of a number of different countries. With that, I feel uniquely qualified to comment on the Proposed Rule Making.

The restructuring of the Amateur Service licensing requirements is a long time coming and a necessity in this era of the shrinking budget. A well-structured regulation will "trim the fat" from the current regulations, provided the Volunteer Examiners with a solid system to administer exams and align itself with the requirements of the Amateur Services of other countries.

We currently have six license classes covering the newcomer to the most advanced. While the American Radio Relay League (ARRL) supports five license classes and the Federal Communication Commission (FCC) has proposed four, I recommend a further cut to three. This can be accomplished with a reduction of the Morse Code requirement to one element of five words per minute (WPM) for privileges below 30 MHz.

Elimination of the Novice class license is a no-brainer. With only 961 applications for this license in 1997 as opposed to 21416 applications of the no-code technician, retention of this entry-level license is not cost effective for the FCC or the volunteer examiner force. The Technician Class license becomes the entry-level license.

The talk of the reduction or elimination of the Morse Code requirement in the Amateur Service will bring heated debate among any group of operators. The time has come to face the fact that communication by Morse Code is an archaic and outdated mode of communication. This fact is supported by the elimination of most commercial telegraphy stations, the elimination of telegraphy from the Maritime Service, and the closure of the Navy and Coast Guard telegraphy stations. It is also supported by the complete elimination of the telegraphy mode for all frequencies controlled the Army, Navy, and Air Force Military Affiliated Radio System (MARS). The staunch supporters of high speed telegraphy in the Amateur Service will lead you to believe when all else fails, telegraphy will be to only mode of communication to get through. This is pure unsupported rubbish. In fact, in the past ten years the Amateur Service has played a significant roll in a number of disasters providing emergency and public service communication. Less than one percent of the traffic handled directly related to the disaster was telegraphy while greater than seventy five percent was routed using digital modes. These facts can be supported by the ARRL if they care to reveal these statistics.

Recently the FCC and the State Department have publicly supported the European Conference of Postal and Telecommunications Administrations (CEPT) Amateur Radio licensing system. Holders of a CEPT Class 1 license will be granted full privileges to the US amateur band and holders of any US license granting privileges below 30 MHz will be granted full privileges in participating CEPT countries. By retaining a telegraphy requirement greater than five WPM, you will create a system, which discriminates against the US licensee. For example, a European country grants amateurs full privileges in their country with only a five-WPM telegraphy requirement. This individual qualifies for a Class 1 CEPT. This individual comes to the United States and is automatically granted full amateur privileges based on his qualification of a Class 1 CEPT. The US licensee with a five-WPM certificate is restricted from the full amateur spectrum based solely on a telegraphy requirement. This is blatant discrimination on the part of the United States Government.

Reduction of the telegraphy requirement to one element of five WPM will allow the government to eliminate the examination credit for the higher telegraphy speeds for examinee's with disabilities. This will eliminate any possible abuse of the physician certification requirements and preclude any possible privacy invasion by the ARRL in seeking an individuals medical information.

Based on the above listed facts I recommend you change the telegraphy requirement for access to all frequencies below 30 MHz to one requirement of five WPM. This will allow an easier modification to the regulations in 2001 if the World Radio Conference votes to eliminate the telegraphy requirement from Article 25S of the International Radio Regulations.

With one telegraphy element it only stands to reason to eliminate the Advanced Class license and combine that class with the Extra Class license to form a new class called the Class 1. The Advance Class license has always been a steeping stone to the Extra Class license for those who could not pass the twenty-WPM telegraphy requirement. The Advanced Class written examination has always been the most rigorous of all the written examinations. I can personally attest to this fact as I have taken the Extra written examination on five occasions since 1984 and have passed the written portion each time with greater that 90 percent only to fail the telegraphy examination. I believe I speak for the majority of those Advanced Class licensees who have failed to move up to the Extra Class license. Restricting an individuals accession to the highest class license base solely the requirements of an outdated mode of communications is not only unfair, but severely limits the technical expertise in the highest class license.

To summarize the above, I recommend the Commission reduce the telegraphy requirement to one element of five WPM. I also recommend the commission reduce the number of license classes to three and rename them to Class 1, Class 2, and Class 3. The Class 3 license would be the entry level with no telegraphy requirement and limit operation to frequencies above 50 MHz. The examination for this class would be similar to the current no-code Technician license. The Class 2 license would be the intermediate license allowing access to the frequencies below 50 MHz. The Class 2 would require a telegraphy examination of five WPM and a written examination similar to the current General Class license. The Class 1 would allow full amateur privileges and require a rigorous examination of radio theory and regulation similar to the current Advanced and Extra class elements. The Class 1 would also require a telegraphy examination of five WPM. Implementation of this new system would be very simple and would eliminate the "perceived loss" of any privileges. All holders of the current No-Code Technician license would be grandfathered to the Class 3 license. All holders of the Novice, Technician-Plus, General and those issued a Technician License prior to 1987 would be grandfathered to the Class 2 license. The Advanced and Extra licensees would be grandfathered to the Class 1.

Although you will eliminate the Novice license, the sub bands should still be retained, but renamed the Low Power sub bands. These bands will be dedicated to the low power experimenters. As the majority of the low power operators, those using less than 25 watts power output, use telegraphy to communicate, it seems only logical to allow these sub bands to be used for low power communication. The only regulation change required is to change the power limit to 25 watts power output.

Testing for the Amateur Service should remain basically the same with only a few changes. The telegraphy examination should be changed to one minute of solid copy out of 5 minutes. Characters should be sent using the "Farnsworth Method" with characters sent at 18 WPM and spacing set to 5 WPM. The multiple-choice test must be eliminated if we reduce the telegraphy requirement to one requirement of five words per minute. This method of testing for the telegraphy element will be a better indicator of the applicant's ability to send and receive the International Morse Code.

The written elements currently in use are generally pretty good. There should be additions to each element concerning the newer forms of communication, i.e. Packet Radio, PACTOR, Satellites, and Spread Spectrum. The current element 3A should be increased to 75 question for the Class 3 license with a minimum passing score of 53 correct answers (70 percent). The current 3B should be increased to 75 questions for the Class 2 license with a minimum passing score of 53 correct answers (70 percent). The Class 1 license should be the combination of Element 4A and 4B and should be 100 questions with a minimum passing score of 70 correct answers (70 percent).

I hope you take my recommendations into serious consideration as I believe these will streamline the process, eliminate unnecessary paperwork and ensure a quality force of operators within the Amateur Service.